



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

MAR 22 2001

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael Thomas
Area Manager, Environmental Services
LTV Steel Company Inc.
3001 Dickey Road
East Chicago, IN 55445

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: IND 005 462 601

Dear Mr. Thomas:

On June 19 - July 1, 2000, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected LTV Steel Company Inc., (LTV) located in East Chicago. The purpose of the inspection was to evaluate LTV's compliance with the Standards Applicable to Generators of Hazardous Waste set forth at 40 CFR part 262. Enclosed please find a copy of our inspection photographs obtained during the June 19 - July 1, 2000 inspection.

Based on the inspection, we have determined that LTV is violating the following requirements:

1. 329 IAC 3.1-7-1/40 CFR 262.11- Failure to properly characterize the following solid wastes to determine if they are hazardous wastes as required. Overall, the wastes listed below make up a very small volume of the wastes generated at the facility.

- Three 55-gallon containers of unknown waste material located near the carpentry shop.
- Five 55-gallon and one 30-gallon containers of unknown waste material located within the Seamless pipe mill.
- Paint booth filters from the electric shop.
- Burn-off oven residue from the electric shop.

- Blast media from the electric shop.
- Partially spent aerosols from the electric shop.
- Waste batteries located near the carpentry shop.
- Waste analyzed for Central Treatment Plant IHW #73-37 exceeded holding times.

2. 329 IAC 3.1-7-8/40 CFR 262.20(a)- LTV failed to list all the characteristic hazardous wastes on a manifest. Silver was not listed as required on Manifest IL6432621.

3. 329 IAC 3.1-7-1/40 CFR 262.40(c)- LTV failed to retain a copy of waste analysis data for wastestream 73-39 (Lab. Waste solvent) and the remediation analytical data for a spill of F007 Tin line washwater 4/8/97.

4. 329 IAC 3.1-10-1/40 CFR 265.16 - LTV failed to provide hazardous waste training to Mr. Calihan as required by the facility training plan.

5. 329 IAC 3.1-10-1/40 CFR 265.54(d)- LTV failed to update the list of emergency coordinators within its contingency plan. Emergency coordinators Coe and Anderson were replaced but the plan was not updated.

6. 329 IAC 3.1-10-1/40 CFR 265.56(j)- LTV failed to provide a written report to the administrator following an incident of releases of hazardous wastes or hazardous waste constituents. At a minimum, six spill events occurred since 1997 and no reports were filed.

- 3/28/00 - FRFC - tanker overfill resulting in release of approximately 30 gallons of K062.
- 6/14/98 - FRF - tank rupture resulting in release of approximately 1,000 gallons of K062.
- 7/15/98 - #2 -Tin Mill - Tin Line - equipment malfunction resulting in release of approximately 100 gallons of F007.
- 4/8/97 - #2 Tin Mill - Tin Line - equipment (temporary line became loose) malfunction resulting in release of approximately 100 gallons of F007.
- 7/22/97 - #2 Tin Mill - Tin Line - tank overflow resulting in release of approximately 10 gallons of F007.
- 12/31/97 - FRF - operator error resulting in release of approximately 500 gallons of K062.

7. 329 IAC 3.1-10-1/40 CFR 265.195(a)(2)- Chrome side tank inspection to look for corrosion or releases of waste from the above ground portions of the tank was not conducted on 6/26/00 as required.

Please note that potential violations of 40 CFR Part 279 Standards for the Management of Used Oil, have been referred to the Indiana Department of Environmental Management (IDEM) who will contact you directly to resolve those violations.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. You should submit your response to Patrick F. Kuefler, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. You should also send a copy of your response to Nancy Johnston, IDEM, Office of Enforcement, at 100 North Senate Avenue, Indianapolis, Indiana 46204-3403.

If you have any questions regarding this matter feel free to contact Patrick F. Kuefler, of my staff, at (312)353-6268.

Sincerely,

Lorna M. Jereza P.E. , Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Enclosure

cc: Nancy Johnston, IDEM